Before the Federal Communications Commission WASHINGTON, D.C. 20554

	1	
)	
In the Matter of)	
)	WC Docket No. 13-39
Rural Call Completion)	
)	

CENTURYLINK PETITION FOR WAIVER

COMMENTS OF PUBLIC UTILITY COMMISSION OF OREGON

The Public Utility Commission of Oregon (OPUC) supports the Petition for Waiver filed by CenturyLink in the above-captioned proceeding.

CenturyLink requests a waiver of the call attempt recording, retention and reporting requirements in sections 64.2103-64.2105 of the Federal Communication Commission's (FCC) rules for calls that use Multi-Frequency ("MF") signaling and intraLATA toll calls handed directly from the originating provider to the terminating provider.

We have reviewed the magnitude of the call data subject to waiver, what call data will not be available, and the rationale for the waivers. We conclude that the number of calls involved is limited; that those calls do not require intermediate carriers; and that call detail records will still be available for investigation, if needed. The proposed waiver keeps ILEC to ILEC intraLATA toll traffic terminating directly which is the preferred method to ensure completed calls.

¹ 47 C.F.R. §§ 64.2103-64.2105

We support CenturyLink's proposal to use the FCC's Safe Harbor provision by only using one intermediary carrier.

We appreciate the opportunity to provide these comments.

DATED: August 8, 2014.

Susan K. Ackerman

Chair

John Savage

Steve Bloom Commissioner